Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 877-7122

C. K. McCoy
Vice President, Nuclear
Vogtle Project

Georgia Power
the southern electric system

May 3, 1991

Docket Nos. 50-424
50-425

ELV-02711

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATION 3.6.3

In accordance with the provisions of 10 CFR 50.90 and 10 CFR 50.59, Georgia Power Company (GPC) hereby proposes to amend the Vogtle Electric Generating Plant (VEGP) Units 1 and 2 Technical Specifications, Appendix A to Operating Licenses NPF-68 and NPF-81.

The proposed revision to Technical Specification 3.6.3, "Containment Isolation Valves," will allow those valves associated with the containment hydrogen monitors to be opened on an intermittent basis under administrative control. This will facilitate surveillance of the containment hydrogen monitors pursuant to the requirements of Technical Specification 4.6.4.1 as well as facilitate testing of the post-accident sampling system.

The proposed change and its basis are described in Enclosure 1. An evaluation pursuant to 10 CFR 50.92 showing that the proposed change does not involve a significant hazards consideration is provided as Enclosure 2. Instructions for incorporation of the proposed change into the Technical Specifications and a mark-up of the affected page is provided as Enclosure 3. In addition, a mark-up of the affected FSAR pages is included for informational purposes as Enclosure 4. GPC requests approval of the proposed change by August 1, 1991.

In accordance with 10 CFR 50.91, the designated state official will be sent a copy of this letter and all enclosures.

A001
1/1

Mr. C. K. McCoy states that he is a Vice-President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company and that, to the best of his knowledge and belief, the facts set forth in this letter and enclosures are true.

GEORGIA POWER COMPANY

By: C. K. McCoy

Sworn to and subscribed before me this 3 day of May, 1991.

Notary Public

MY COMMISSION EXPIRES JANUARY 12, 1993

CKM/TWS/ts

Enclosures:
1. Basis for Proposed Change
2. 10 CFR 50.92 Evaluation
3. Instructions for Incorporation and Revised Pages
4. FSAR Changes

c(w): Georgia Power Company
Mr. W. B. Shipman
Mr. P. D. Rushton
Mr. S. H. Chesnut
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebneter, Regional Administrator
Mr. D. S. Hood, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

State of Georgia
Mr. J. D. Tanner, Commissioner, Department of Natural Resources

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT
TECHNICAL SPECIFICATION CHANGE
OPENING OF CONTAINMENT ISOLATION VALVES TO FACILITATE
CALIBRATION OF THE CONTAINMENT HYDROGEN MONITORS

## BASIS FOR PROPOSED CHANGE

### Proposed Change

The proposed change to the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications will modify specification 3.6.3 to allow intermittent opening of the containment isolation valves associated with the containment hydrogen monitors. Opening of the subject containment isolation valves will be controlled by administrative procedures and will facilitate surveillance of the containment hydrogen monitors pursuant to the requirements of Technical Specification 4.6.4.1. In addition, the proposed change will facilitate testing of the post-accident sampling system (PASS). The proposed change provides the corrective action discussed in our letter ELV-02446, dated February 8, 1991 in reply to the NRC Notice of Violation issued January 11, 1991.

### Basis

Technical Specification 4.6.4.1 currently requires that the containment hydrogen monitors be demonstrated operable by the performance of a channel check at least once per 12 hours, an analog channel operational test at least once per 31 days, and a channel calibration at least once per 92 days on a staggered test basis using sample gas containing one volume percent hydrogen, balance nitrogen, and four volume percent hydrogen, balance nitrogen.

Georgia Power Company (GPC) maintains that the technically proper method of performing the required quarterly channel calibration involves opening the containment isolation valves associated with the hydrogen monitors. This allows verification of the flowpath as well as the flowrate delivered by the hydrogen monitor pump. Furthermore, testing of the PASS with respect to sampling the containment atmosphere requires that these valves be opened. Specification 3.6.3 requires that the containment isolation valves remain operable while in Modes 1, 2, 3, and 4. However, opening of the containment isolation valves associated with the containment hydrogen monitors while in Modes 1, 2, 3, and 4 to perform the surveillance requirements of Technical Specification 4.6.4.1 requires that all of the subject valves be declared inoperable. This results in a plant configuration not allowed by the Technical Specifications due to the requirement of Specification 3.6.3 that at least one isolation valve in an affected penetration, inboard or outboard, remain operable. Consequently, if this condition cannot be met, the provisions of Specification 3.0.3 become applicable.

ENCLOSURE 1 (CONT'D)

VOGTLE ELECTRIC GENERATING PLANT
TECHNICAL SPECIFICATION CHANGE
OPENING OF CONTAINMENT ISOLATION VALVES TO FACILITATE
CALIBRATION OF THE CONTAINMENT HYDROGEN MONITORS

BASIS FOR PROPOSED CHANGE

During the development of the Unit 1 Technical Specifications and prior to the issuance of the Unit 1 Operating License, the table of containment isolation valves, which appears in the Westinghouse Standard Technical Specifications, NUREG-0452, Draft Revision 5, as Table 3.6-1, was relocated from the Unit 1 Technical Specifications to Table 16.3-4 of the FSAR. This table, as it appears in the Standard Technical Specifications, contains a footnote which would allow certain valves to be opened periodically under administrative control. However, when this table was relocated to the FSAR, this footnote was not included. Addition of a note to Specification 3.6.3 allowing intermittent opening of the containment isolation valves associated with the hydrogen monitors is consistent with the intent of the Westinghouse Standard Technical Specifications.

ENCLOSURE 2

VOGTLE ELECTRIC GENERATING PLANT
TECHNICAL SPECIFICATION CHANGE
OPENING OF CONTAINMENT ISOLATION VALVES TO FACILITATE
CALIBRATION OF THE CONTAINMENT HYDROGEN MONITORS

10 CFR 50.92 EVALUATION

Pursuant to 10 CFR 50.92, Georgia Power Company (GPC) has evaluated the attached proposed amendment and has determined that operation of the facility in accordance with the proposed amendment would not involve a significant hazards consideration.

Background

By letter dated January 11, 1991, the Nuclear Regulatory Commission (NRC) transmitted the results of the Vogtle Special Team Inspection conducted August 6 through 17, 1990, and Notice of Violation (NRC Inspection Report Numbers 50-424/90-19 and 50-425/90-19). The Notice of Violation cited the opening of containment isolation valves associated with the containment hydrogen monitors for the purpose of performing the quarterly surveillance, required by Technical Specification 4.6.4.1, as a violation of Technical Specification 3.6.3.

GPC maintains that the technically proper method of performing the required quarterly channel calibration involves opening the containment isolation valves associated with the containment hydrogen monitors. Furthermore, testing the capability of the post-accident sampling system (PASS) requires that the subject containment isolation valves be opened. Accordingly, the purpose of this change is to allow opening of the containment isolation valves associated with the containment hydrogen monitors on an intermittent basis under administrative control.

Analysis

Technical Specification 4.6.4.1 currently requires that the containment hydrogen monitors be demonstrated operable by the performance of a channel check at least once per 12 hours, an analog channel operational test at least once per 31 days, and a channel calibration at least once per 92 days on a staggered test basis using sample gas containing one volume percent hydrogen, balance nitrogen, and four volume percent hydrogen, balance nitrogen.

As stated above, GPC maintains that the technically proper method of performing the required quarterly channel calibration of the hydrogen monitors, as well as testing of the PASS, involves opening the subject containment isolation valves. This allows verification of the flowpaths as well as the flowrate delivered by the hydrogen monitor pump.

ENCLOSURE 2 (CONT'D)

VOGTLE ELECTRIC GENERATING PLANT
TECHNICAL SPECIFICATION CHANGE
OPENING OF CONTAINMENT ISOLATION VALVES TO FACILITATE
CALIBRATION OF THE CONTAINMENT HYDROGEN MONITORS

10 CFR 50.92 EVALUATION

Specification 3.6.3 requires that the containment isolation valves remain operable while in Modes 1, 2, 3, and 4. However, opening of the containment isolation valves associated with the containment hydrogen monitors while in Modes 1, 2, 3, and 4 to perform the surveillance requirements of Technical Specification 4.6.4.1 requires that all of the subject valves be declared inoperable. This results in a plant configuration not allowed by the Technical Specifications due to the requirement of Specification 3.6.3 that at least one isolation valve in an affected penetration, inboard or outboard, remain operable. Consequently, if this condition cannot be met, the provisions of Specification 3.0.3 become applicable.

During the development of the Unit 1 Technical Specifications and prior to the issuance of the Unit 1 Operating License, the table of containment isolation valves, which appears in the Westinghouse Standard Technical Specifications, NUREG-0452, Draft Revision 5, as Table 3.6-1, was relocated from the Unit 1 Technical Specifications to Table 16.3-4 of the FSAR. The table, as it appears in the Standard Technical Specifications, contains a footnote which would allow certain valves to be opened periodically under administrative control. However, when this table was relocated to the FSAR, this footnote was not included. The addition of a note to Technical Specification 3.6.3 allowing opening of the containment isolation valves associated with the containment hydrogen monitors is consistent with the intent of the Westinghouse Standard Technical Specifications.

The hydrogen monitoring system is designed as a Class 1E, Seismic Category 1 system, and is designed to retain its integrity and operability under all conditions following a design basis accident (DBA). Therefore, the practice of opening the subject containment isolation valves poses no additional risk since the containment hydrogen monitoring system has been demonstrated to be capable of withstanding the post-accident environment inside containment. In addition, the essential portions of the PASS are designed to Seismic Category 1 requirements and the PASS is designed to function under post-accident conditions.

Furthermore, the post accident processing system, which includes the containment hydrogen monitoring system and the PASS, is subject to regular leakage assessment pursuant to Technical Specification 6.7.4.a.5 to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during serious transients or accidents.

Specifically, this equipment is tested using a leak rate monitor at a pressure of 45.3 to 46 psig in accordance with procedures 24932-1 and 2, "Containment Penetration No. 71A Train A Hydrogen Monitor Suction Local Leak Rate Test" for Train A, and procedures 24910-1 and 2, "Post Accident Sampling System Gaseous Leakage Assessment" for Train B. The peak containment pressure under which Type A testing must be performed is 45 psig as specified in Technical Specification 3/4.6.1.1.

Conclusion

Based on the above considerations, GPC has concluded the following concerning the requirements of 10 CFR 50.92:

1. Opening of the containment isolation valves associated with the containment hydrogen monitors on an intermittent basis under administrative control does not significantly increase the probability or consequences of accidents previously evaluated. The hydrogen monitoring system is designed as a Class 1E, Seismic Category 1 system, and is designed to retain its integrity under all conditions following a DBA. In addition, the essential portions of the PASS are designed to Seismic Category 1 requirements and the PASS is designed to function under post-accident conditions. Opening of the subject valves will be administratively controlled, consistent with the intent of the Westinghouse Standard Technical Specifications. The post-accident processing system, which includes the containment hydrogen monitoring system and the PASS, is subject to regular leakage assessment in accordance with Technical Specification 6.7.4.a.5 to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during serious transients or accidents. Accordingly, the radiological consequences for any accident previously reviewed and approved associated with the plant licensing basis are not significantly increased by the proposed change. Therefore, this change will not significantly increase the probability or consequences of accidents previously evaluated.

2. The opening of the containment isolation valves associated with the containment hydrogen monitors, as well as the PASS, on an intermittent basis under administrative control will not create the possibility of a new or different kind of accident from any previously evaluated. New failure modes have not been defined for any system or component important

to safety nor has any new limiting single failure been identified as a result of the proposed change. Therefore, the proposed change does not create the possibility of a new or different kind of accident previously evaluated in the FSAR.

3. The margin of safety provided in the bases to any Technical Specification is not significantly reduced because the post-accident processing system, which includes the containment hydrogen monitors and the PASS, has been demonstrated to be capable of withstanding the post-accident environment inside containment. Therefore, containment integrity will not be adversely impacted. Opening of the containment isolation valves associated with the containment hydrogen monitors on an intermittent basis under administrative control is consistent with the intent of the Westinghouse Standard Technical Specifications. Therefore, the current level of safety associated with containment integrity and with the containment hydrogen monitors will not be diminished by the proposed Technical Specification revision.

Based on the preceding discussion, GPC has concluded that the proposed revision to the Technical Specifications does not involve a significant hazards consideration as defined by 10 CFR 50.92 (c).

ENCLOSURE 3

VOGTLE ELECTRIC GENERATING PLANT
TECHNICAL SPECIFICATION CHANGE
OPENING OF CONTAINMENT ISOLATION VALVES TO FACILITATE
CALIBRATION OF THE CONTAINMENT HYDROGEN MONITORS

INSTRUCTIONS FOR INCORPORATION

The proposed amendment to the Technical Specifications would be incorporated as follows:

| Remove Page | Insert Page |
|---|---|
| 3/4 6-15* and 3/4 6-16 | 3/4 6-15* and 3/4 6-16 |

* Overleaf page contains no change